

CONTINUATION OF COMPLAINT

1. I, ATF Special Agent Geoffrey Yandl, have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since 2007. I completed twelve weeks of Criminal Investigative Training and fourteen weeks of Special Agent Basic Training. My responsibilities include the investigation of criminal violations of Titles 18 and 21 of the United States Code. I am currently assigned to the ATF Field Office in Grand Rapids, Michigan.

2. The information in this criminal complaint is based on my personal knowledge gained from this investigation and other law enforcement agents. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. I am currently conducting an investigation of **DEMETRIUS WILLIAM VINEY, JR.**, date of birth XX/XX/1993 (hereafter referred to as **VINEY**), for violations of, among other things, Title 18, United States Code, Section 922(g)(1) – felon in possession of a firearm.

4. I queried **VINEY** through the Law Enforcement Information Network (LEIN), which revealed MI SID number 4234035J, and the following Michigan felony convictions: December 9, 2013—Felony Police Officer Assaulting/Resisting/Obstructing (20th Circuit Court 13-037130-FH); May 13, 2015—Felony Possession of a Controlled Substance (20th Circuit Court 15-039034-FH).

5. At approximately 5:00 p.m. on September 11, 2016, **VINEY** was at the home of an acquaintance and displayed a handgun to that individual. The acquaintance disclosed this information to detectives.

6. At approximately 3:00 a.m. on September 12, 2016, **VINEY** got into an altercation that resulted in the exchange of gunfire outside the Hookah Lounge in Holland, Michigan. According to witnesses, **VINEY** pulled a handgun and shot it during that altercation.

7. Detectives responded to the scene of the exchange of gunfire, and located a SCCY, model CPX-2, 9mm semiautomatic pistol under a rock at a nearby residence. A Michigan State Lab report determined that **VINEY**'s DNA was present on the SCCY 9mm pistol. The SCCY, model CPX-2, 9mm semiautomatic pistol is consistent with the descriptions given by witnesses.

8. Based on my training and experience in determining how firearms travel through interstate commerce, the SCCY firearm was manufactured in the state of Florida. Therefore, it traveled through interstate commerce prior to its possession by **VINEY**.

9. The foregoing is provided in support of this complaint charging that **DEMETRIUS WILLIAM VINEY, JR.**, a convicted felon, did knowingly and intentionally possess a firearm in violation of 18 U.S.C. § 922(g)(1).